

1 Andrew H. Wilson
WILSON, RYAN & CAMPILONGO
2 115 Sansome Street
Fourth Floor
3 San Francisco, CA 94104
(415) 391-3900

4 Laurie J. Bartilson
5 MOXON & BARTILSON
6255 Sunset Blvd., Suite 2000
6 Hollywood, CA 90028
(213) 960-1936

7 Attorneys for Creditor
8 CHURCH OF SCIENTOLOGY INTERNATIONAL

9 UNITED STATES BANKRUPTCY COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11) CASE NO. 95-10911 aj
12)
12	In re) PLAINTIFF'S INITIAL
13) DISCOVERY DISCLOSURES
13) PURSUANT TO FEDERAL RULES
14) OF CIVIL PROCEDURE, RULE 26
14)
15	GERALD ARMSTRONG,)
15)
16)
16	Debtor)
17) TRIAL DATE: Feb. 13, 1996
18)

19 Pursuant to Federal Rules of Civil Procedure Rule 26(a)(1),
20 plaintiff/creditor, Church of Scientology International, makes
21 the following disclosures:

22 **A. Individuals Likely To Have Discoverable Information**

- 23 1. Gerald Armstrong
- 24 2. Michael Walton
Solina Walton
25 707 Fawn Drive
San Anselmo, CA 94960
- 26 3. Michael Douglas
Kima Douglas
27 108 Oak Drive
San Rafael, CA
- 28 4. Nancy Rodes

- 1 5. Jerry Solfvin
2 2001 Drake Drive
3 Oakland, CA 94611
- 4 6. Lorien Phippeny aka Bambi Sparks
- 5 7. Andrew Armstrong
6 Denver, Colorado
- 7 8. Lorrie Eaton
8 Telegraph Ave.
9 Oakland, CA
- 10 9. Iolna Dawson
11 Massachusetts
- 12 10. Thomas McPherson
- 13 11. Michael Dick
- 14 12. Trevor Dick
- 15 13. Colin Dick
- 16 14. Anthony Armstrong
- 17 15. Michael Flynn
- 18 16. Lawrence Heller
19 HELLER & EDWARDS
20 9454 Wilshire Blvd., Suite 500
21 Beverly Hills, CA 90212
- 22 **B. Documents Or Things In Plaintiff's Possession That May**
23 **Be Relevant**
- 24 1. Voluntary petition for bankruptcy of Gerald Armstrong;
- 25 2. Articles of Incorporation of Gerald Armstrong
26 Corporation ("GAC");
- 27 3. Letter from Gerald Armstrong to Michael Walton dated
28 August 14, 1990;
4. "A Crash Course in Speculation;"
5. "To the American People," dated January 10, 1991;
6. Letter from Gerald Armstrong to Saddam Hussein, dated
November 1, 1990;

- 1 7. Letter from Gerald Armstrong to Javier Perez de
- 2 Cuellar, dated November 7, 1990;
- 3 8. "The Gulf," dated December 10, 1990, and attachments;
- 4 9. Letter from Gerald Armstrong to the Republican National
- 5 Committee dated October 23, 1992, and attachment;
- 6 10. "Our Pledge," undated, copyright 1992;
- 7 11. "Our Deadline," undated, copyright 1992;
- 8 12. "Present Currency," undated, copyright 1992;
- 9 13. "Wisdom Has No Downside," undated, copyright 1992;
- 10 14. Mutual Release of All Claims and Settlement Agreement
- 11 executed by Armstrong on December 6, 1986;
- 12 15. Declaration of Lawrence E. Heller dated March 2, 1992,
- 13 with all attachments;
- 14 16. "Settlement Agreement" labeled "Work Copy" and signed
- 15 by Armstrong on December 6, 1986;
- 16 17. Order of Permanent Injunction filed October 17, 1995 in
- 17 Church of Scientology International v. Gerald Armstrong, et al.,
- 18 Marin County Superior Court, Case Number 157680 ("the State
- 19 Action");
- 20 18. Order of Summary Adjudication of the 4th, 6th and 11th
- 21 causes of action in the State Action;
- 22 19. Portions of the Declaration of Gerald Armstrong dated
- 23 November 17, 1991, filed in the case of Church of Scientology of
- 24 California v. Gerald Armstrong, Los Angeles Superior Court, Case
- 25 No. C 420153;
- 26 20. Portions of the Declaration of Gerald Armstrong dated
- 27 March 16, 1992, filed in the State Action;
- 28 21. Portions of the Declaration of Gerald Armstrong dated

1 January 13, 1995, filed in the State Action;

2 22. Declaration of James H. Bostrom, dated November 5,
3 1990;

4 23. "Defendant's Brief" in the case of Church of
5 Scientology of California, et al. v. Gerald Armstrong, Court of
6 Appeal of the State of California, Second Appellate District,
7 Case No. B 038975, dated December 28, 1990;

8 24. Portions of the Declaration of Gerald Armstrong, dated
9 December 25, 1990;

10 25. Letter from Gerald Armstrong to Eric Lieberman dated
11 June 21, 1991;

12 26. Portions of the Declaration of Gerald Armstrong dated
13 July 16, 1991;

14 27. Order of summary judgment as to the 13th, 16th, 17th
15 and 19th causes of action in the State Action;

16 28. Portions of the video interview of Gerald Armstrong by
17 Spanky Taylor and Jerry Whitfield, dated November 6, 1992;

18 29. Letter from Gerald Armstrong to Laurie Bartilson dated
19 December 22, 1992;

20 30. Portions of the Declaration of Gerald Armstrong dated
21 February 2, 1992;

22 31. Letter from Gerald Armstrong to Laurie Bartilson dated
23 May 3, 1993;

24 32. Letter from Gerald Armstrong to Andrew Wilson dated
25 August 15, 1993;

26 33. Stock certificates in GAC produced by Armstrong in the
27 State Action;

28 34. Letter from Gerald Armstrong to Michael Walton dated

1 August 23. 1990;

2 35. Promissory notes from Michael and Kima Douglas to

3 Gerald Armstrong dated July 28, 1987; June 1, 1988; June 3, 1988;

4 June 1, 1990;

5 36. Letter from Gerald Armstrong to Michael and Kima

6 Douglas dated August 30, 1990;

7 37. Letter from Michael and Kima Douglas to Gerald

8 Armstrong dated September 6, 1990;

9 38. Portions of the following depositions taken in the

10 State Action:

11 Gerald Armstrong, June 24, 1992;

12 Gerald Armstrong, July 22, 1992;

13 Gerald Armstrong, October 7, 1992;

14 Gerald Armstrong, October 8, 1992;

15 Gerald Armstrong, March 10, 1993;

16 Gerald Armstrong, March 17, 1994;

17 Gerald Armstrong, August 18, 1994;

18 Gerald Armstrong, August 19, 1994;

19 Michael Douglas, August 30, 1994;

20 Michael Douglas, September 2, 1994;

21 Lynn Farny, July 26, 1994;

22 Nancy Rodes, August 30, 1994;

23 Gerald Solfvin, March 23, 1995;

24 Michael Walton, February 24, 1993;

25 Michael Walton, March 18, 1994;

26 Solina Walton, January 26, 1995.

27 39. Portions of the deposition of Gerald Armstrong taken in

28 Religious Technology Center, et al v. Yanny, et al., LA County

1 Superior Court, Case No. BC 330035, dated October 11, 1991;
2 40. Portions of the deposition of Gerald Armstrong taken in
3 Hunziker, et al. v. Applied Materials, et al., Santa Clara County
4 Superior Court, Case No. 692629, dated March 3, 1992;
5 41. Real estate disclosure statement re 707 Fawn Drive datd
6 March 4, 1990;
7 42. Real estate purchase contract re 707 Fawn Drive dated
8 March 12, 1990;
9 43. Note from Armstrong to "MLW" dated September 10, 1990;
10 44. Deed of Trust re 707 Fawn Drive, dated May 14, 1990;
11 45. Closing documents from Fidelity National Title dated
12 May 18, 1990;
13 46. Grant Deed to two parcels in Marin County dated May 15,
14 1990;
15 47. Grant Deed from Gerald Armstrong and Michael Walton to
16 Michael Walton dated August 24, 1990;
17 48. "Fawn Expenditures from personal accounts" dated August
18 28, 1990;
19 49. Grant deed from Michael Walton to Michael Walton and
20 Solina Behbehani, datd December 29, 1990;
21 50. Note from Armstrong to Mike & Solina dated March 20,
22 1991;
23 51. Grant deed from Michael Walton and Solina Behbehani to
24 Michael Walton and Solina Walton, dated October 24, 1991;
25 52. Escrow statement re 707 Fawn Drive dated February 25,
26 1992;
27 53. Quitclaim deed from Michael Walton to Solina Walton
28 dated March 1, 1992;

1 54. Grant deed from Michael Walton and Solina Behbehani-
2 Walton dated July 20, 1993.

3 **C. Computation Of Categories Of Damages Claimed**

4 Plaintiff claims as damages the amount of the final judgment
5 in the State Court Action, which is yet to be determined,
6 together with costs and attorneys' fees in that action, and
7 together with costs and fees connected with this action. Summary
8 adjudication has resulted in a judgment in favor of plaintiff in
9 the amount of \$300,000 thus far.

10 Dated: November 6, 1995

Respectfully submitted,

11 Andrew H. Wilson
12 WILSON, RYAN & CAMPILONGO

13 MOXON & BARTILSON

14 By: 
15 Laurie J. Bartilson

16 Attorneys for Creditor
17 CHURCH OF SCIENTOLOGY INTERNATIONAL
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I am employed in the County of California, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On November 6, 1995, I served the foregoing document described as PLAINTIFF'S INITIAL DISCOVERY DISCLOSURES PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE, RULE 26 on interested parties in this action,

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

Linda Sorensen
Feldman, Waldman & Kline
2700 Russ Bldg.
235 Montgomery St.
San Francisco, CA 94104-3160

☒ BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

1 Executed on November 6, 1995, at Los Angeles,
2 California.

3 [] **(BY PERSONAL SERVICE) I delivered such
4 envelopes by hand to the offices of the
addressees.

5 Executed on _____, at Los Angeles, California.

6 [X] (State) I declare under penalty of the laws
7 of the State of California that the above is true
and correct.

8 [] (Federal) I declare that I am employed in the
9 office of a member of the bar of this court at
whose direction the service was made.

10 Abe E. Demara
11 Print or Type Name

Abe E. Demara
Signature

12 * (By Mail, signature must be of person depositing
13 envelope in mail slot, box or bag)

14 ** (For personal service signature must be that of
15 messenger)